

Re: International Finance Corporation v. Korat Waste to Energy Co., 07 CIV 5451 (SHS)

Dear Judge Stein:

New York, New York 10007-1312

I write on behalf of all parties to request that the Court adjourn the parties' deadline for the completion of discovery in this matter. According to this Court's Endorsed Letter, docketed on January 24, 2008, the current deadline is March 28, 2008. The parties jointly request that the deadline be extended to May 30, 2008.

The parties have completed a great deal of discovery, but much more remains. Each side has issued and responded to dozens of document requests and interrogatories. KWTE has also issued several requests for admission, to which IFC is preparing to respond within the next two weeks. On March 11, 2008, the parties participated in a conference call to work through various issues related to each party's discovery responses.

Each party has produced thousands of documents. The parties are now reviewing those documents. While many documents have been reviewed, the parties need additional time to examine these documents.

The parties are also working on a deposition schedule. Because this action involves international organizations and companies with relevant employees overseas in several different countries, coordinating depositions will be a challenge. The parties foresee taking depositions of individuals from Thailand, the Netherlands, and the United States. The likely deponents are executives who travel constantly as part of their duties. The parties are confident, however, that a workable schedule can be created. To do that, however, requires the parties to have more time to adequately prepare for and conduct these depositions.

Hon. Sidney H. Stein

WHITE & CASE

March 12, 2008

With the additional time requested by this letter, the parties believe that they will be able to complete discovery and possibly be able to narrow the issues for summary judgment motions in the summer.

Pursuant to Your Honor's Individual Practices: (1) the original deadline for the completion of fact discovery was February 29, 2008; (2) there has been one previous request for adjournment of this deadline; (3) it was granted in part; and (4) all parties consent to this request.

Respectfully submitted,

dely. J

Francis A. Vasquez, Jr.

FAV/dp

cc: Anthony King, Esq.
Elkan Abramowitz, Esq.
J. Eileen Schwartz, Esq.
Thomas M. Keane, Esq.

The May 30, SO ORDERED, 3 NB

SIDNEY H. STEIN